

SCOTT R. LACHMAN, ESQ.  
Nevada Bar No. 12016  
NICHOLAS E. BELAY, ESQ.  
Nevada Bar No. 15175  
**AKERMAN LLP**  
1180 N. Town Center Dr., Suite 290  
Las Vegas, Nevada 89144  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: scott.lachman@akerman.com  
Email: nicholas.belay@akerman.com

*Attorneys for Deutsche Bank National Trust Company,  
as Trustee for GSAMP TRUST 2007-HSBC1 Mortgage  
Pass-Through Certificates, Series 2007-HSBC1*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ONORIO RAMOS,

Plaintiff,

v.

SABLES, LLC, a Nevada limited liability  
company; WILMINGTON FINANCE, INC., a  
Delaware corporation; DEUTSCHE BANK  
NATIONAL TRUST COMPANY, AS  
TRUSTEE FOR GSAMP TRUST 2007-HSBC1  
MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2007-HSBC1;  
DOES I through X and ROE BUSINESS  
ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:25-cv-00776-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[FIRST REQUEST]**

Plaintiff Onorio Ramos (**Ramos**) and Defendants Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2007-HSBC1 Mortgage Pass-Through Certificates, Series 2007-HSBC1 (**Deutsche Bank**) and Wilmington Finance, Inc. (**Wilmington**), by and through their respective counsel of record, respectfully stipulate to a sixty (60) day extension of the discovery and scheduling order deadlines. This is the parties' first request for an extension of any of the deadlines identified in this stipulation.

**I. Introduction:** This dispute arises out plaintiff Onorio Ramos's complaint concerning the real property located at 4305 Puebla Street, Las Vegas, NV 89115. Ramos raises claims for: quiet title, declaratory judgment, injunctive relief, violation of TILA, breach of contract and/or breach of the implied covenant of good faith and fair dealing, fraud/conspiracy, violation of NRS 107.028, and violation of NRS 107.200 et seq. *See* Am. Compl., ECF No. 32. Ramos seeks a declaration that the first-position deed of trust recorded against the property has been extinguished, as well as monetary damages. Deutsche Bank contends its deed of trust remains a valid encumbrance on the property, and Defendants dispute that Ramos is entitled to any relief. All of the parties are now in agreement to extend the discovery schedule.

**II. Statement Specifying the Discovery Completed:**

On June 18, 2025, the court entered a stipulated discovery plan and scheduling order [ECF No. 17], setting the following deadlines:

- (a) Discovery Deadline: November 18, 2025.
- (b) Initial Expert Disclosure Deadline: September 19, 2025.
- (c) Rebuttal Expert Disclosure Deadline: October 20, 2025.
- (d) Dispositive Motion Deadline: December 18, 2025.
- (e) Pre-trial Order Deadline: January 19, 2026, or 30 days after an order is entered on any dispositive motion filed.

The following discovery has been **completed**:

- 1. Deutsche Bank served its initial disclosures on June 27, 2025.

The following discovery remains **outstanding**:

- 1. Ramos and Wilmington to serve their initial disclosures.
- 2. All parties to serve written discovery and responses.
- 3. Third-party subpoenas.
- 4. Scheduling of depositions.

**III. Reason Why Extension is Required / Good Cause.**

The parties are requesting a sixty (60) day extension of the discovery cutoff and related scheduling order deadlines. Good cause supports the requested extension for several reasons. First,

Ramos just recently amended his complaint in August 2025 to add additional claims and a new party (Wilmington) to the action, which has affected the timing and scope of remaining discovery to complete. Both Ramos and Wilmington still need to serve their initial disclosures, which the parties agree will be completed no later than November 5, 2025. Once the initial disclosures are served, Deutsche Bank intends to serve its follow-up written discovery on the other parties and schedule depositions. Second, both Deutsche Bank and Wilmington have only recently responded to the amended complaint, filing motions to dismiss in September 2025, which are still being briefed. The briefing schedule on these motions have been extended for various reasons, not least of which family health matters on the part of Ramos's counsel. For the same reasons, the parties require additional time to complete discovery, in particular as it pertains to scheduling the parties' depositions. Third, Deutsche Bank and Ramos have been conducting preliminary settlement discussions. The requested discovery extension will allow the parties to continue settlement negotiations, while deferring the costs of completing the Rule 30(b)(6) depositions within the current deadline. In order to facilitate the completion of discovery, the parties therefore respectfully request a sixty (60) day extension to the current deadlines.

#### **IV. Proposed Schedule for Completing All Remaining Discovery:**

The parties agree to extend discovery by sixty (60) days, and request the court enter the following order extending discovery as follows:

- (a) Discovery Cut Off: **Tuesday, January 20, 2026<sup>1</sup>**
- (b) Initial Expert Disclosure Deadline: **Wednesday, November 18, 2025.**
- (c) Rebuttal Expert Disclosure Deadline: **Thursday, December 18, 2025.**
- (d) Dispositive motions: **Thursday, February 19, 2026**
- (e) Pre-Trial Order: **Friday, March 20, 2026.<sup>2</sup>**

<sup>1</sup> The date occurring sixty (60) days following the original discovery deadline falls on Saturday, January 17, 2026. Monday January 19, 2026 is a federal holiday. The parties agree to move this deadline to the next business day.

<sup>2</sup> This deadline will be suspended if dispositive motions are timely filed until thirty (30) days after the decision of the dispositive motions or until further order of the court.

(f) Extensions/Modifications of Discovery Plan: **Monday, December 29<sup>3</sup>, 2026.**

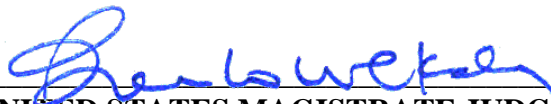
This stipulation is made in good faith and not for the purpose of delay.

Dated: October 23, 2025.

<b>AKERMAN LLP</b> <u>/s/ Nicholas E. Belay</u> SCOTT R. LACHMAN, ESQ. Nevada Bar No. 15175 NICHOLAS E. BELAY, ESQ. Nevada Bar No. 15175 AKERMAN LLP 1180 N. Town Center Dr., Suite 290 Las Vegas, NV 89144  <i>Attorneys for Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2007-HSBC1 Mortgage Pass-Through Certificates, Series 2007-HSBC1</i>	<b>HONG &amp; HONG LAW OFFICE</b> <u>/s/ Joseph y. Hong</u> JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 festival Plaza Dr., Suite 650 Las Vegas, Nevada 89135  <i>Attorney for Onorio Ramos</i>
<b>GREENBERG TAURIG, LLP</b> <u>/s/ Joel E. Tasca</u> JOEL EDWARD TASCA, ESQ. Nevada Bar No. 14124 10845 Griffith Peak Dr., Suite 600 Las Vegas, Nevada 89135  <i>Attorneys for Wilmington Finance, Inc.</i>	

**ORDER**

**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**  
Case No.: 2:25-cv-00776-APG-BNW

DATED: October 24, 2025

<sup>3</sup> The date occurring sixty (60) days following the original extension or modification deadline falls on Saturday, December 27, 2025. The parties agree to move this deadline to the next business day.